



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

WA 6819
8/5/02
SC

Reply To
Attn Of: OEA-095 August 5, 2002

MEMORANDUM

SUBJECT: Review comments, Transformer PCB Investigation Plan
Boeing Plant 2 Seattle/Tukwila, Wa June 27, 2002

FROM: Bernie Zavala *B. Zavala*
Hydrogeologist

TO: Anna Filutowski
RCRA Site Manager

FILE COPY

I have reviewed the above-mentioned document and I offer the following comments for your consideration. Overall, I concur with the approach which was proposed in this Investigation Plan. I recommend that our QA Office review this Investigation Plan but more importantly Appendix A, the Quality Assurance Project Plan. Prior to approval of the Transformer PCB Investigation Plan, the comments below must be addressed.

Specific Comments

Section 2

Page 2-1

1) The sample depth and location must be included on figure 2.0 for the soil sample of PCB with the concentration of 460,000 $\mu\text{g}/\text{kg}$ which was reference in the text. Also, please identify the meaning of the flag "T" after the soil concentration.

4.3 Data to be collected

Page 4-2

2) The text states that soil samples will be collected at 47 different locations at possibly six different depths depending on the presence of PCBs in the soil or sediment. How will the presence of PCBs in the soil or sediment be determined prior to going to either the next location or the next depth? The work plan is not clear on how this will be performed in the field. Please describe the decision process for sampling vertically for both soil and sediments.



Quality Assurance Project Plan
21 June 2002

Section 3

3.1 Sampling Process Design (Experimental Design)

Page 3-1

3) Please correct the text in this section, three monitoring wells will be sampled in accordance to section 4.3 of the Investigation Plan and up to 282 soil/sediment samples could be collected.

4) An additional table is needed which will show number of soil and sediment samples as well as the number QA samples. The type and number of QA samples must also be listed such as trip blanks, field duplicates and MS/MSD.

5) Table 1 -QA/QC Analytical Summary..., must also include Completeness, preservation, container and holding times.

Please feel free to contact me if there are any questions on the above comments.